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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

LEE REED,

Petitioner,

vs.

TIM GARRETT, WARDEN, *et al.*,

Respondents.

Case No.: 2:21-cv-00942-APG-EJY

**UNOPPOSED MOTION FOR  
ENLARGEMENT OF TIME TO RESPOND  
TO THE REPLY TO PETITIONER'S FIRST  
AMENDED PETITION FOR WRIT OF  
HABEAS CORPUS  
(FOURTH REQUEST)**

Respondents, by and through legal counsel, Aaron D. Ford, Attorney General of the State of Nevada, and John C. Dorame Deputy Attorney General, hereby move this Court for an order granting them a fourteen (14) day enlargement of time, or up to and including Wednesday, September 20, 2023, to file and serve their response to the reply to the first amended petition for writ of habeas corpus of Petitioner, Lee Reed ("Reed").

This motion is based on the provisions of Rule 6(b) of the Federal Rules of Civil Procedure and the attached Declaration of Counsel, as well as all other papers, documents, records, pleadings, and materials on file herein.

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1 This is Respondents' third request for an enlargement of time to respond to the reply to Reed's  
2 petition. Respondents make this motion in good faith and not for the purpose of unnecessary delay.

3 RESPECTFULLY SUBMITTED this 6th day of September, 2023.

4 AARON D. FORD  
5 Attorney General

6 By: /s/ John C. Dorame  
7 JOHN C. DORAME (Bar. No. 10029)  
8 Deputy Attorney General  
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## DECLARATION OF COUNSEL

STATE OF NEVADA            )  
   : ss.  
 CARSON CITY                )

I, JOHN C. DORAME, hereby state, based on personal knowledge and/or information and belief, that the assertions of this declaration are true:

1. I am a Deputy Attorney General in the Post-Conviction Division of the Nevada Attorney General's Office, and I make this declaration on behalf of Respondents' motion for enlargement of time.

2. On March 6, 2023, Respondents filed their answer to Petitioner Lee Reed's ("Reed") petition for writ of habeas corpus. ECF No. 40.

3. On June 16, 2023, Reed filed his Reply to Respondents' answering brief. ECF No. 44. Pursuant to this Court's scheduling order, a response to the reply is currently due September 6, 2023. By this motion, I am requesting an enlargement of time of fourteen (14) days to file a response to Reed's reply. This is my fourth request for enlargement.

4. Since the last extension, which occurred on August 30, 2023 I have been involved in defending various federal and state petitions. Among the deadlines were: a response to a petition in *Romero-Manzo v. Garrett, et. al.*, (USDC 3:22-cv-00475-ART-CLB), a response to a petition in *Caballero v. Warden* (Case No. 23 EW 00011 1B), and a response to a petition in *Holley v. Warden* (Case No. A-23-873115-W). In addition, I am still caring for a family member who recently had a surgical procedure and still requires 24-hour in-home care. As such, I request a fourteen (14) day enlargement of time, up to and including September 20, 2023, to respond to the reply.

5. This motion for enlargement of time is made in good faith and not for the purpose of unduly delaying the ultimate disposition of this case. As noted, several Deputy Attorney Generals in our division have either transferred to other divisions or left the Attorney General's Office in the past several months. The division remains understaffed, and the workload continues to increase.

6. On September 5, 2023, I contacted petitioner's counsel, Christopher R. Oram, Esq. who indicated he has no objection to this enlargement.

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1 Pursuant to 28 U.S.C. § 1746, Declarant herein certifies, under penalty of perjury, that the  
2 foregoing is true and correct.

3 Dated this 6<sup>th</sup> day of September, 2023

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5 /s/ John C. Dorame  
JOHN C. DORAME (Bar No. 10029)  
6 Deputy Attorney General

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9 **ORDER**

10 IT IS SO ORDERED.

11 Dated this 6<sup>th</sup> day of September, 2023.

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DISTRICT COURT JUDGE